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CLERK OF DISTRICT COURT
DISTRICT OF NEVADA

MAIL ROOM

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$158,677.17 in UNITED STATES
CURRENCY,

Defendant.

2:12-CV-2125-GMN-(PAL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$761,515.36 in UNITED STATES
CURRENCY,

Defendant.

2:12-CV-2126-JCM-(CWH)

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$844,586.92 in UNITED STATES
CURRENCY,

Defendant.

2:12-CV-2127-GMN-(CWH)

1 **NOTICE OF RELATED CASES¹ OR MOTION FOR AN ORDER REASSIGNING CASES**

2 The United States of America, by and through Daniel G. Bogden, United States Attorney for
3 the District of Nevada, and Daniel D. Hollingsworth, Assistant United States Attorney, moves this
4 Honorable Court for an Order reassigning the related cases to the same United States District Court
5 Judge and the same United States Magistrate Judge.

6 *United States v. \$158,677.17 in United States Currency*, case number 2:12-CV-2125-GMN-
7 (PAL); *United States v. \$761,515.36 in United States Currency*, case number 2:12-CV-2126-JCM-
8 (CWH); and *United States v. \$844,586.92 in United States Currency*, case number 2:12-CV-2127-
9 GMN-(CWH) are all related to the criminal case *United States v. Ramon Desage, aka Ramon Abi-
10 Rached, aka Raymond Antoine Abi-Rached*, case number 2:13-CR-039-JCM-(VCF). Based on this,
11 the United States of America requests these three civil forfeiture in rem cases be reassigned to the
12 same judges in the criminal case, United States District Court Judge James C. Mahan and United
13 States Magistrate Judge Cam Ferenbach.

14 The grounds for reassigning, but not consolidating, the cases are (1) the three civil cases and
15 the criminal case involve the same parties and similar claims; (2) the three civil cases and the criminal
16 case involve the same transactions and the same events; (3) the three civil cases and the criminal case
17 involve the same questions of fact and the same questions of law, and their assignment to the same
18 United States District Court Judge and the same United States Magistrate Judge is likely to effect a
19 substantial savings of judicial effort; and (4) the three civil cases and the criminal case would entail
20 substantial duplication of labor if the actions were heard by different United States District Court

21 ...

22
23
24 ¹ On August 31, 2006, the Court issued General Order No. 2006-05, requiring counsel to file
25 with the Court and to serve on all parties a "Notice of Related Cases" when filing actions that may be
26 related to each other. This order states the Court will determine whether to consolidate the actions.
The United States does not want these civil cases consolidated and is only seeking that all actions be
assigned to the same United States District Court Judge and the same United States Magistrate Judge.

Judges and by different United States Magistrate Judges. These factors meet the requirements the Court gave in determining whether cases are related.

The Court listed the factors in determining when cases would be considered related:
(1) both actions involve the same parties and are based on the same or similar claim;
(2) both actions involve the same property, transaction or event;
(3) both actions involve similar questions of fact and the same question of law and their assignment to the same District Judge and/or Magistrate Judge is likely to effect a substantial savings of judicial effort, either because the same result should follow in both actions or otherwise; or
(4) for any other reasons, it would entail substantial duplication of labor if the actions were heard by different District Judge or Magistrate Judge.

General Order 2006-05.


The three civil forfeiture in rem cases and the criminal case are related and should be assigned to the same United States District Court Judge and the same United States Magistrate Judge, but not consolidated. Accordingly, it would be in the interests of judicial economy to reassign the above-named civil cases to the Honorable James C. Mahan and the Honorable Cam Ferenbach.

For the foregoing reasons, the United States of America requests the three civil forfeiture in rem cases be assigned to the same United States District Court Judge and the same United States Magistrate Judge as the criminal case: the Honorable James C. Mahan and the Honorable Cam Ferenbach.

DATED this 8th day of February, 2013.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney


DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

IT IS SO ORDERED this 11th day of February, 2013.


Gloria M. Navarro
United States District Judge